

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FOX VALLEY CONSTRUCTION	)	
WORKERS FRINGE BENEFIT FUNDS,	)	
<i>et al.</i> ,	)	
	)	CIVIL ACTION
Plaintiffs,	)	
	)	NO. 10 C 7300
vs.	)	
	)	JUDGE MATTHEW F. KENNELLY
LONNIE DANTZLER, d/b/a D AND B	)	
CONSTRUCTION,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, LONNIE DANTZLER, d/b/a D AND B CONSTRUCDTION, in the total amount of \$12,681.30, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$4,461.00.

On April 9, 2011, the Summons and Complaint was served on the Defendant (by posting and mailing a copy of said documents to him pursuant to the Court's Order entered on March 21, 2011) (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on May 2, 2011. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

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### **CERTIFICATE OF SERVICE**

The undersigned, at attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of the Court using the CM/ECF system. In addition, the undersigned hereby certifies that she mailed the above referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 19th day of May 2011:

Mr. Lonnie Dantzler  
D and B Construction  
400 W. 76th Street, Suite 330  
Chicago, IL 60620

/s/ Cecilia M. Scanlon \_\_\_\_\_

Cecilia M. Scanlon  
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